NORTHLAND COMMUNICATIONS CORPORATION

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VIA ELECTRONIC COMMENT FILING SYSTEM

November 28, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Compliance Letter (November 28, 2005)
        WC Docket No. 05-196

Dear Ms. Dortch:

As required under FCC DA 05-2945, attached for filing with the FCC, please find the Compliance Letter of Northland Communications Corporation, on behalf of its affiliates and subsidiaries providing VoIP services.

Please direct any questions or correspondence to the undersigned at (206) 621-1351 or via email (paul@northlandco.com).

Sincerely,

Paul Milan
Senior Counsel

cc(via email): Kathy Berthot, Deputy Chief (kathy.berthot@fcc.gov)
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Background

Various affiliates and subsidiaries of Northland Communications Corporation provide VoIP services primarily in smaller rural markets. Northland offers VoIP services through its third party vendor Net2Phone, Inc. ("Net2Phone"). Under its arrangement with Net2Phone, Northland markets and sells VoIP services in certain of its cable television systems to Northland broadband customers. Northland currently offers VoIP services in fourteen of its cable television systems. The fourteen Northland cable systems currently offering VoIP serves are included herein as Table A. Upon receiving a request for service, Northland installs equipment necessary for VoIP services at the customer premises. At installation, Northland obtains the customer acknowledgment of the limits of Northland's 911 services and obtains the customer's initial registered location. Northland then activates the service through software and systems provided by Net2Phone. Under Northland's arrangement with Net2Phone, Net2Phone supply the technical and network operations for VoIP services. Northland understands that Net2Phone utilizes the services of various third party providers for certain aspects of the VoIP services, including, in some instances, 911 services.

911 Solution

Northland has been informed that Net2Phone enables E911 services in compliance with the *VoIP E911 Order* in those areas where Net2Phone's third-party providers offer E911 access ("*E911 Markets*"). Emergency calls in *E911 Markets* are routed through selective routers (where selective routers are available) by Net2Phone's third-party providers to the geographically appropriate PSAP based on the registered location provided to Northland by its customers and, in turn, to Net2Phone by Northland. Northland understands that Net2Phone's E911 service passes along to the PSAP both the Automatic Location Information ("ALI") based on the user's Registered Location and the Automatic Numbering Information ("ANI") associated with the call.

Northland understands that in those markets where Net2Phone does not have full E911 access reasonably available from third-party providers, Net2Phone, in conjunction with third-party providers, has implemented an alternate form of emergency access, Network 911 or N911. In the N911 scenario, when a customer dials 9-1-1, Net2Phone sends a query to the database of a third-party provider such as Intrado. Based on the ANI information in the call stream, Intrado sends back the 10-digit routing number associated with the geographically appropriate PSAP for the customer's registered address. Net2Phone then routes the call to the 10-digit routing number associated with the PSAP. Should there be any failure in the call stream or lack of communication between Net2Phone and its third-party 911 providers, such as Intrado, or if the customer's information is not able to be located by the third-party 911 provider, Net2Phone's Network Operations Center ("NOC") is alerted. The call is then automatically routed to Intrado's Emergency Call Relay Center ("ECRC") where a live Intrado operator, trained to handle emergency calls, asks the customer where they are located. The trained operator, remaining on the line, makes a second call to the PSAP associated with the customer's physical location. If the customer cannot speak, the ECRC operator dips into the Intrado database associated with the customer's telephone number and will make the PSAP call based on the customer's last registered location. In the event Intrado cannot retrieve the customer information, the Intrado operator engages the Net2Phone NOC and the customer's information are relayed to the ECRC in real-time. Prior to implementation of N911, Northland and Net2Phone test the service on a market-by-market basis with its third-party providers to test for full functionality.[1]

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[1] Further technical information is available from filings related to FCC DA 05-2945 by Net2Phone.

As of November 28, 2005, Northland's VoIP services are compliant with the FCC's VoIP 911 order in those cable system service areas as indicated on Table A. The compliant systems comprise approximately 20% of Northland's current VoIP customers. Northland intends to become compliant as its third-party provider's capabilities increase. Northland is not able to estimate the expected date of full compliance.

Obtaining and Updating Registered Location Information.
Northland obtains the initial customer registered location information during customer installation. The initial registered location is captured on the Subscriber Agreement. The Subscriber Agreement is substantially similar to the Subscriber Notice which was submitted as Exhibit A to Northland August 10, 2005 filing. As of November 28, 2005, Northland has systems in place to capture 100% of its customer's initial register locations. After initial installation, customers may update their registered location by contacting Northland in person or via telephone, fax, email or mail.

Technical Solution for Nomadic Subscribers:
Northland is evaluating available technical solutions for nomadic uses of Northland's VoIP services.

Table A

Market Name	Rate Center Name	NPA	NXX	E911	N911
Bennettsville	MCCOLL_SC	843	400		Yes
Bennettsville	BENNETTSVL_SC	843	535		Yes
Carthage	CARTHAGE_MS	601	741		Yes
Corsicana	CORSICANA.TX	903	229	Yes	
Flint	FRANKSTON_TX	903	481		Yes
Flint	TYLER.TX	903	705	Yes	
Forest	**FOREST_MS**	**601**	**564**		Yes
Forest	**MORTON_MS**	**601**	**864**		Yes
Forest City	FORESTCITY_NC	828	202		Yes
Forest City	RUTHEFRDTN_NC	828	395	Yes	
Kosciusko	KOSCIUSKO_MS	662	633		Yes
Marble Falls	BURNET_TX	512	553		Yes
Marble Falls	MARBLE FLS_TX	830	265		Yes
Marlin	**MARLIN_TX**	**254**	**275**		Yes
Moses Lake	MOSES LAKE_WA	509	855		Yes
New Caney	CONROE_TX	936	647	Yes	
New Caney	SPLENDORA.TX	281	306	Yes	
New Caney	HUFFMAN_TX	281	324		Yes
New Caney	HUMBLE.TX	281	783	Yes	
Royston	**ROYSTON_GA**	**706**	**498**		Yes
Sandersville	SANDERSVL_GA	478	247		Yes
Sandpoint	**SANDPOINT_ID**	**208**	**946**		Yes
Seneca	CENTRAL.SC	864	506	Yes	
Seneca	LIBERTY.SC	864	843	Yes	
Seneca	PICKENS.SC	864	898	Yes	
Seneca	PENDLETON_SC	864	645		Yes
Seneca	WESTMINSTER_SC	864	613		Yes
Seneca	EASLEY.SC	864	306	Yes	
Seneca	CLEMSON.SC	864	643	Yes	
Seneca	SENECA.SC	864	973	Yes	
Starkville	COLUMBUS_MS	662	570		Yes
Starkville	STARKVILLE_MS	662	546		Yes
Statesboro	STATESBORO_GA	912	225		Yes

Swainsboro	SWAINSBORO_GA	478	268		Yes
Vidalia	**VIDALIA_GA**	**912**	**386**		Yes